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12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15
16 UNITED STATES OF AMERICA,) No. CR-14-0316 VC
17 Plaintiff,) STIPULATION AND [PROPOSED]
18 v.) ORDER TO CONTINUE
19 RYAN CHAMBERLAIN,)
20 Defendant.)
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At the last appearance before this Court, the parties informed the Court that this case involved a voluminous amount of discovery and that the defense needed time to review and consider that discovery. The defense has yet to complete that process and requests additional time. Accordingly, the parties are jointly requesting that the status conference presently set for November 17, 2014 at 2:00 p.m. be continued to December 15, 2014 at 2:00 p.m.

For the above reasons, the parties stipulate there is good cause – taking into account the public interest in the prompt disposition of this case – to exclude the time from November 17, 2014 to December 15, 2014 from computation under the Speedy Trial Act, and that failing to exclude that time would unreasonably deny the defendant and his counsel the reasonable time necessary for effective preparation of counsel taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties further agree that the ends of justice would be served by excluding the time from November 17, 2014 to December 15, 2014 from computation under the Speedy Trial Act and that the need for the exclusion outweighs the best interests of the public and the defendant in a speedy trial.

IT IS SO STIPULATED.

11/12/14
DATED

/s/
PHILIP KEARNEY
Assistant United States Attorney

11/12/14
DATED

/s/
JODI LINKER
Assistant Federal Public Defender

IT IS SO ORDERED.

November 12, 2014
DATED


VINCE CHHABRIA
United States District Judge